

FILED  
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS

JUN 30 PM 4:19

U.S. DISTRICT COURT  
DISTRICT OF MASS.

RAFAEL DE ARMAS,  
Plaintiff,

v.

C.A. NO. 1:21-CV-11069-PBS

NELSON ALVES and  
JOSEPH L. ELSMORE,  
Defendants.

**DEFENDANTS MOTION TO FILE UNDER SEAL EXHIBITS CONTAINING  
PLAINTIFF'S MEDICAL INFORMATION**

Now come the Defendants and submit the following Motion to File Under Seal Exhibits, Q, R, S, and T in support of their Motion for Summary Judgement, Memorandum of Law in Support of their Motion for Summary Judgement, and their Statement of Material Facts. Exhibit's Q, R, S, T contain personal medical/mental health information, including the medical diagnosis and mental health treatment of Plaintiff Rafael De Armas.

For these reasons, Defendants respectfully request that the Court issue an order permitting the filing under seal of the unredacted Exhibits noted above.

Respectfully submitted,

By Defendants  
By their Attorney,  
NANCY ANKERS WHITE  
Special Assistant Attorney General

Dated: June 30, 2023

/s/ Veronica E. DeDosantos  
Veronica E. DeDosantos  
Senior Litigation Counsel  
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**CERTIFICATE OF SERVICE**

I, Veronica E. DeDosantos, counsel for defendants, hereby certify that I have served a copy of the forgoing via electronic mail, first-class mail, through the Court's electronic filing system (ECF) to Plaintiff's attorneys.

Sarah Kelly (BBO#664267)  
Andrew Farrington (BBO#709148)  
Nutter McClennen & Fish LLP  
Seaport West  
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Boston, MA 02210

Dated: June 30, 2023

/s/ Veronica E. DeDosantos  
Veronica E. DeDosantos